

STATE OF CALIFORNIA)
)
 COUNTY OF LOS ANGELES) ss.:

JEFFREY P. NOLAN, being duly sworn, deposes and says:

1. I am an attorney at law duly licensed to practice before all courts in the State of California. I am an attorney with the law firm of Pachulski Stang Ziehl & Jones LLP, attorneys of record for Plaintiff, Howard M. Ehrenberg in his capacity as Liquidating Trustee of Orion Healthcorp, Inc., et al., for the estates of the above-captioned debtors, counsel of record in this adversary proceeding. The facts stated herein are of my own personal knowledge, or made known to me from a review of the files and pleadings in this action which are maintained in the ordinary course of business. If called upon as a witness to any facts set forth herein, I could and would competently testify thereto.

2. Attached hereto as **Exhibit 1** are true and correct copies of excerpts of the deposition of Arvind Walia taken on October 28, 2021, pages 352-354, in the above referenced adversary.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Plaintiff's First Request For the Production of Documents.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Defendants' Responses, as was marked Exhibit 30 at the deposition of Arvind Walia.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the email bate-stamped AWNK003013-3014 as labelled by Defendant and produced to this office and the undersigned in response to Plaintiff's Request For the Production of Documents.

6. Attached hereto as **Exhibit 5** is a true and correct copy of Membership Interests Purchase Agreement ("MIPA") Exhibit 15, from the deposition of Defendant Walia,

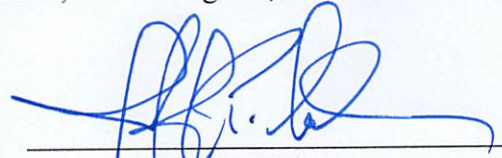
bate-stamped AWNK003104-3168. The MIPA is a document produced by Defendant in this litigation and maintained in the files of this firm.

7. Attached hereto as **Exhibit 6** are true and correct copies of documents received by Plaintiff in response to a duly issued subpoena to JPMorgan Chase, bate-stamped EHREN-NIKNIM CHASE 000001-2 and 000171-197.

8. Attached hereto as **Exhibit 7** is the Proposed Order Granting Plaintiff's Motion For Summary Judgment, Or In The Alternative Summary Adjudication, Against Defendants John Petrozza and Abruzzi Investments, LLC.

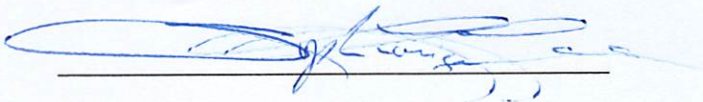
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 18th day of January, 2023, at Los Angeles, California.



Jeffrey P. Nolan

SWORN TO AND SUBSCRIBED before me this
18th day of January, 2023.


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